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1   UNITED STATES DISTRICT COURT

2   NORTHERN DISTRICT OF CALIFORNIA

3

     IN RE: FACEBOOK, INC.,   MDL No. 2843

4   CONSUMER USER PROFILE   Case No.

     LITIGATION   18-md-02843-VC-JSC

5   _____

6   This document relates to:

7   ALL ACTIONS

8

     _____

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11   **HIGHLY CONFIDENTIAL**

12   ZOOM DEPOSITION OF FACEBOOK's 30(b)(6)

13   CORPORATE REPRESENTATIVE - SIMON CROSS

14   (Reported Remotely via Video & Web Videoconference)

15   London, England (Deponent's location)

16   Tuesday, June 21, 2022

17   Volume 5

18

19   **REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED**

20

     STENOGRAPHICALLY REPORTED BY:

21   REBECCA L. ROMANO, RPR, CSR, CCR

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24   JOB NO. 5291734

25   PAGES 986 - 1222

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7   ALL ACTIONS

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15   DEPOSITION OF SIMON CROSS, taken on

16   behalf of the Plaintiffs, with the deponent located

17   in London, England, commencing at

18   1:37 p.m., Tuesday, June 21, 2022, remotely

19   reported via Video & Web videoconference before

20   REBECCA L. ROMANO, a Certified Shorthand Reporter,

21   Certified Court Reporter, Registered Professional

22   Reporter.

23

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 2    (All parties appearing via Web videoconference)

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1   APPEARANCES OF COUNSEL(cont'd)

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15   ALSO PRESENT:

16   Ian Chen, Associate General Counsel,

17   Meta Platforms

18   John Macdonell, Videographer

19

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 1                        I N D E X

 2    DEPONENT                              EXAMINATION

 3    SIMON CROSS                                  PAGE

      VOLUME 5

 4

 5                    BY MR. MELAMED              998

 6                    BY MR. LOESER             1139

 7                    BY MR. SCHWING            1206

 8                    BY MR. LOESER             1207

 9

10

11                   E X H I B I T S

12    NUMBER                                       PAGE

13                    DESCRIPTION

14    Exhibit 429  Native Excel Spreadsheet        1007

15               C2_019_FB-CA-MDL-02936297;

16

17    Exhibit 430  Message Summary,                1101

18               FB-CA-MDL-02898663 -

19               FB-CA-MDL002898668;

20

21    Exhibit 431  Native Excel Spreadsheet,       1107

22               C2_113a_FB-CA-MDL-02898670;

23

24    Exhibit 432  Native Excel Spreadsheet,       1111

25               FB-CA-MDL-02674226;
```

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 1                 E X H I B I T S(cont'd)

 2    NUMBER                                         PAGE

 3                     DESCRIPTION

 4    Exhibit 433  Email String Subject:  V1        1116

 5                 extensions,

 6                 FB-CA-MDL-01952426 -

 7                 FB-CA-MDL-01952427;

 8

 9

10                PREVIOUSLY MARKED EXHIBITS

11    NUMBER                                        PAGE

12    Exhibit 339                                   1171

13

14

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1	London, England; Tuesday, June 21, 2022	09:04:04
2	1:37 p.m.	
3	---o0o---	
4		
5	THE VIDEOGRAPHER: Okay. We're on the	01:36:58
6	record. It's 1:37 p.m. on June 21st, 2022. This	
7	is Volume 5 in Simon Cross's deposition. We're	
8	here in the matter of Facebook Consumer Privacy	
9	User Profile Litigation.	
10	I'm John Macdonell, the videographer with	01:37:15
11	Veritext.	
12	Mr. Cross has previously been sworn, but	
13	would counsel please identify themselves for the	
14	record.	
15	MR. MELAMED: Good morning. This is	01:37:26
16	Matt Melamed from Bleichmar Fonti & Auld on behalf	
17	of plaintiffs. With me presently is Adele Daniel	
18	from Keller Rohrback, also on behalf of plaintiffs.	
19	And -- I'm sorry -- also Anne Davis from	
20	Bleichmar Fonti & Auld on behalf of plaintiffs.	01:37:43
21	MR. SCHWING: Good morning. This is	
22	Austin Schwing of Gibson, Dunn & Crutcher on behalf	
23	of Meta Platforms Inc. I'm joined by Ian Chen,	
24	Hannah Regan-Smith, and also Phuntso Wangdra and	
25	Matt Buongiorno.	01:38:00

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1	SPECIAL MASTER GARRIE: This is	01:38:07
2	Special Master Garrie here on behalf of the Court.	
3	MR. MELAMED: Good morning. Before we	
4	start today's testimony, I just want to identify a	
5	few documents or sources of information that	01:38:29
6	Mr. Cross discussed yesterday that we want to	
7	follow up with Facebook regarding their production.	
8	One is the Can tables, which Mr. Cross, I	
9	believe, identified yesterday, as tables initiated	
10	in or around 2019 operational, in or around 2020,	01:38:53
11	that identified the calls that -- certain calls	
12	that apps could make on either data.	
13	Another is the Did tables, which were	
14	initiated around the same time. And those indicate	
15	the calls -- the calls that return user	01:39:21
16	information, where the information was returned, so	
17	those two seem to work in parallel. I apologize if	
18	I'm misstating. I don't intend to. What those	
19	tables were, I think Mr. Cross's testimony on those	
20	was clear yesterday.	01:39:37
21	The third is Pearly Gates. Which	
22	Mr. Cross identified as a precursor or the	
23	precursor to the capabilities tool.	
24	And the fourth is the Launch Manager,	
25	which was identified as a tool to track privacy --	01:39:49

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1	a number of privacy decisions that were made	01:39:55
2	internally at Facebook. Same thing with those two.	
3	I don't mean to misstate what Mr. Cross testified	
4	about those. His testimony is what it was. I'm	
5	just identifying them for the record.	01:40:09
6	Three of those four, the Can tables, the	
7	Did tables and Pearly Gates, I do not believe have	
8	been identified previously. The plaintiffs in the	
9	litigation, the fourth Launch Manager has been	
10	identified previously, and plaintiffs have	01:40:23
11	requested that previously.	
12	And would -- are going to request it	
13	again.	
14	But I just wanted to put that on the	
15	record that we will follow up as well.	01:40:34
16	MR. SCHWING: Okay. Well, I appreciate	
17	you raising the issues that you're concerned about,	
18	Matt -- Mr. Melamed, you and I are friendly, so I	
19	apologize for the "Matt."	
20	But I know Mr. Cross has previously	01:40:53
21	identified Pearly Gates in a previous deposition	
22	session, and the same is true of the Did table.	
23	And you already knew about the Launch Manager.	
24	Happy -- happy to talk to you, you know, about	
25	document discovery issues. I don't think this is	01:41:12

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1	the right time. But, you know, we can certainly	01:41:16
2	discuss that.	
3	And I also wanted to -- to note, as I did	
4	before we got on the record, that Mr. Cross had a	
5	few things that he wanted to clarify, some	01:41:26
6	additional information related to some of the	
7	questioning yesterday.	
8	So at a convenient point in the	
9	deposition, whenever you think it's appropriate, he	
10	would like to share that.	01:41:38
11	MR. MELAMED: Thank you.	
12		
13	SIMON CROSS,	
14	having been previously administered an oath, was	
15	examined and testified as follows:	01:41:41
16	EXAMINATION (resumed)	
17	BY MR. MELAMED:	
18	Q. So, Mr. Cross, you understand you're	
19	still under oath, correct?	
20	A. I do.	01:41:45
21	Q. What --	
22	SPECIAL MASTER GARRIE: Are we on the	
23	record?	
24	MR. MELAMED: Mr. --	
25	Special Master Garrie, sorry.	01:41:49

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1	SPECIAL MASTER GARRIE: Yeah, I am sorry	01:41:51
2	for interrupting. I was going to say, in the	
3	interest of efficiency, it would be most helpful if	
4	the parties could meet and confirm on the issues	
5	decided and discussed, and add the issue to	01:41:59
6	mediation tracker so that way we have a record of	
7	these ongoing issues.	
8	If there are downstream issues about each	
9	of these different things, I just wanted to notate	
10	that now because I have other issues that I've	01:42:13
11	written down that haven't been raised on the	
12	mediation tracker, and I'm just assuming they're	
13	being resolved.	
14	So if the parties have a process that's	
15	great. I just encourage them to document it so we	01:42:24
16	don't have any downstream surprises with additional	
17	folks coming -- being required in the interest of	
18	completeness. And if you could just document that	
19	from the plaintiff's side, that would very helpful.	
20	MR. MELAMED: Will do. Thank you.	01:42:41
21	Q. (By Mr. Melamed) So, Mr. Cross, your --	
22	Mr. Schwing indicated that you have some additional	
23	testimony or clar- -- testimony or clarifying	
24	testimony regarding some things you talked about	
25	yesterday.	01:42:55

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1   So now would be a great time to provide   01:42:55

2   that clarification.

3

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12   A.   That's my understanding too, yes.

13   Q.   Do you have any other clarifications or

14   follow up you want to offer regarding yesterday's

15   testimony?   01:46:36

16

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16   Q.   Okay.   Thank you.

17   Okay.   Can you see my screen?

18   A.   Yes.

19

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5   (Exhibit 429 was marked for   01:53:47

6   identification by the court reporter and is

7   attached hereto.)

8   MR. MELAMED: So I've marked what -- I

9   have introduced what's been marked as Exhibit 429.

10   Exhibit 429 is Bates number FB-CA-MDL-0236297.   01:53:54

11   ████████████████████████

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19   MR. SCHWING: Mr. Melamed, it's not

20   showing up in the Exhibit Share. I'm not sure if   01:54:43

21   that -- we need to do something to get into the

22   Exhibit Share.

23   MR. MELAMED: I think there is a new day

24   of -- of -- for the Exhibit Share, and I think that

25   it says day 5.   01:54:57

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 1              MR. SCHWING:  Okay.  I will figure that        01:55:03

 2    out.

 3              MR. MELAMED:  Okay.

 4              MR. SCHWING:  Thank you.

 5         Q.   (By Mr. Melamed)  Mr. Cross, are you able      01:55:05

 6    to see it or at least able to see it on my screen

 7    well enough to be able to testify about it?

 8         A.   I can see it yeah, and I -- I also have

 9    it in Exhibit Share.

10         Q.   Okay.                                          01:55:15

11         A.   By the new date.

12              MR. MELAMED:  Mr. Schwing, would you like

13    me to wait until you're able to pull it up.

14              MR. SCHWING:  I was able to figure it

15    out.  Thank you.                                         01:55:24

16              MR. MELAMED:  Okay.

17
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25 Q. (By Mr. Melamed) In -- and just to be 02:29:15

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1	more concrete.	02:29:17
2	Are you aware that in 2014 Facebook	
3	announced it would deprecate friends permissions	
4	APIs?	
5	A. I'm aware that Facebook said it was going	02:29:33
6	to make friend permissions unavailable to most of	
7	third-party developers.	
8	Q. Okay. Did you hear the word -- did you	
9	understand that Facebook used the term	
10	"deprecation" when it -- or deprecate when it made	02:29:48
11	that announcement?	
12	MR. SCHWING: Object to form.	
13	THE DEPONENT: I'm aware of the term	
14	"deprecated" being used in -- in that context.	
15	Q. (By Mr. Melamed) Okay. And that the	02:29:59
16	announcement was that friends permissions would be	
17	deprecated for apps then using Graph 1.0 by	
18	April 30th, 2015.	
19	Do you understand that?	
20	MR. SCHWING: Object to form.	02:30:22
21	THE DEPONENT: There's a number of	
22	different ways that the changes that were announced	
23	were -- were explained to developers. And, again,	
24	deprecated -- the word "deprecated" can be used	
25	in -- can mean different things in different	02:30:36

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```
 1    contexts.  Again, in this context it means              02:30:39

 2    something very specific.

 3         Q.   (By Mr. Melamed)  So in the context of

 4    this tool, if "is deprecated" -- let me withdraw

 5    that and ask a different question.                       02:30:51
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9   THE DEPONENT: Mr. Melamed, would now be

10   a good time to take a break? We've been going for   02:58:21

11   an hour and a half. I could -- I could do with a

12   break, a quick break.

13   MR. MELAMED: Let's go off the record.

14   THE VIDEOGRAPHER: Okay. We're off the

15   record. It's 2:58 p.m.   02:58:30

16   (Recess taken.)

17   THE VIDEOGRAPHER: We're back on the

18   record. It's 3:33 p.m.

19   ████   ██████████   ██████████████

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24   MR. SCHWING: Object to form. I'll just

25   object once to this line of questioning asking   04:23:33

                                                      Page 1074

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1    about a document that isn't placed before the          04:23:36

2    witness.

3              MR. MELAMED:  Sure.
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1   determine whether an app made the API call for   04:59:28

2   which it was granted access by the Capabilities

3   table?

4   MR. SCHWING: Object to form.

5   THE DEPONENT: The Method table   04:59:48

6   identifies API calls made by a specific app. By

7   "method," some of those methods are gated by a

8   capability, but other -- other methods the -- the

9   behavior of the response is altered by a

10   capability, for example.   05:00:12

11   So it's not -- it's not a reliable way to

12   determine whether or not an app was accessing data

13   that was modified by a capability.

14   Q.   (By Mr. Melamed) I understand that. I'm

15   trying to just understand the request from an app.   05:00:33

16   Where would I go to determine whether,

17   and if so, how many times an app requested -- I'm

18   sorry -- an app made an API call that -- for which

19   it was granted the capability of a capabilities

20   tool?   05:01:02

21   MR. SCHWING: Object to form.

22   THE DEPONENT: My understanding is in the

23   past, certainly there was a way of understanding

24   whether or not a given app capability pair was

25   being used, by which I mean, the app was making API   05:01:31

                                                Page 1097

1	calls that involved the check of a capability.	05:01:39
2	That information, I recall being	
3	displayed in the -- in the capability tool at	
4	one -- at one time in the past. Although precisely	
5	where that data was stored today, again the tool	05:01:57
6	has evolved over time.	
7	But I recall that information being	
8	logged at one point in the past.	
9	Q. (By Mr. Melamed) Do you know when that	
10	information was logged in the capability tool -- or	05:02:09
11	let me rephrase that.	
12	Do you know when the capabilities tool	
13	stopped logging that information?	
14	A. So it's important to say here that the	
15	capability tool doesn't necessarily log that	05:02:31
16	information. That information is part of the API	
17	code base that runs. I recall that that	
18	information was displayed in the capability tool	
19	starting in -- in -- in 2014 or so.	
20	I -- I don't -- I -- I don't know if that	05:02:54
21	information is still displayed in the capability	
22	tool, and I would imagine that it is still being	
23	logged however.	
24	Q. Do you know where the information is	
25	being logged?	05:03:09

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1   A.   It's likely that that information is   05:03:14

2   being stored in -- in Facebook's data warehouse.

3   Again, my understanding is that that -- that is the

4   kind of information that is used to determine

5   whether or not an app is actively using a   05:03:28

6   capability.

7   Q.   And by data warehouse, do you mean

8   "Hive," or something different?

9   A.   I'm referring to Hive when I -- when I

10 mean data warehouse.   05:03:40

11   Q.   Do you know what table within Hive stores

12 that tracking information?

13   A.   Do I know which -- which table -- sorry,

14 no, I don't have the specific name of the table

15 that may or may not contain that information.   05:04:06

16   Q.   I'm sorry -- if you wanted to know

17 whether such a table existed in Hive and, if so

18 which table it was, who would you ask?

19   A.   I would ask Mr. Molaro in the first

20 instance.   05:04:23

21   Q.   And you said that though the capabilities

22 tool did not log that information, it reflected

23 that information starting in 2014; is that right?

24   A.   I recall the capabilities tool reflecting

25 some reflection of capability app pair usage in   05:04:49

                                                      Page 1099

1   around 2014.   05:04:55

2   Q.   Do you recall the point at which the

3   capabilities tool no longer reflected information

4   regarding capability app pairs? I'm sorry, calls

5   on capability app pairs?   05:05:14

6   A.   So my personal involvement with the

7   capability tool ended in around 2015. And so

8   that's -- the period from 2013 or late 20- -- 2014

9   to '15 is -- is what I'm relying on here for my

10   testimony, so I'm using the phrase "my   05:05:36

11   recollection."

12   As I -- my understanding is that -- it's

13   likely that the usage of capability checks is -- is

14   still being logged. But I -- I can't confirm which

15   table, or whether or not or how that information is   05:05:59

16   represented in the capability tool today.

17   Q.   When you left -- when you stopped using

18   the capabilities tool in your personal capacity as

19   a Facebook employee, was the information regarding

20   whether an app capability pair was still being   05:06:21

21   called, still reflected in the capabilities tool?

22   A.   My -- my recollection is that that

23   information was -- was still reflected in the

24   capabilities tool. And I'm just being accurate on

25   the word here. My understanding is that it was   05:06:39

                                              Page 1100

1	logging if the capability was checked.	05:06:41
2	Q. What does it mean to -- to say a	
3	"capability was checked"?	
4	A. My understanding of -- of how capability	
5	is implemented in the code base is that there is	05:06:56
6	a -- what's called a capability check, which is	
7	a -- a function call given an app ID and a	
8	capability as to whether or not the app had access	
9	to the capability, and that's called a capability	
10	check.	05:07:18
11	MR. MELAMED: We can go off the record.	
12	THE VIDEOGRAPHER: Okay. We're off the	
13	record it's 5:07 p.m.	
14	(Recess taken.)	
15	THE VIDEOGRAPHER: We are back on the	05:07:56
16	record. It's 5:21 p.m.	
17	(Exhibit 430 was marked for	
18	identification by the court reporter and is	
19	attached hereto.)	
20	Q. (By Mr. Melamed) Mr. Cross, I've just	05:21:18
21	marked Exhibit 430. It is a message discussion	
22	between Steven Elia, Scott Mellon, Eddie O'Neil,	
23	Drew Lackman, Cathy Huang, Tatyana --	
24	SPECIAL MASTER GARRIE: Guys, I'm ready	
25	to roll whenever you guys are.	05:21:34

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1	MR. SCHWING: We're -- we're underway,	05:21:37
2	Special Master Garrie. I don't know if you can	
3	hear us. Yeah, we've started.	
4	SPECIAL MASTER GARRIE: Counsel Melamed.	
5	MR. MELAMED: Yup, we're going. Can you	05:21:49
6	hear?	
7	SPECIAL MASTER GARRIE: Am I talking to	
8	myself.	
9	THE COURT REPORTER: Should we go off the	
10	record?	05:22:01
11	MR. MELAMED: Yeah, let's go off the	
12	record.	
13	THE VIDEOGRAPHER: We're off the record.	
14	(Recess taken.)	
15	THE VIDEOGRAPHER: We're back on the	05:22:16
16	record. It's 5:22 p.m.	
17	MR. MELAMED: So I've just marked	
18	Exhibit 430. It's a message summary. The date on	
19	the document is June 14th, 2018. It includes	
20	Cathy Huang, Steve Elia, Scott Mellon,	05:22:39
21	Eddie O'Neil, Drew Lackman, Cathy Huang -- sorry,	
22	if I mentioned her twice. Tatyana Poturnak and	
23	Konstantinos Papamiltiadis. And it runs from	
24	Bates number FB-CA-MDL-02898663 through -8668.	
25	Q. (By Mr. Melamed) This message summary	05:23:10

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 1   runs chronologically, so from top to bottom.          05:23:12

 2          Have you had a chance to look at this

 3   document, Mr. Cross?

 4       A.   I saw this document in preparation for

 5   today, but I would appreciate a few minutes just       05:23:31

 6   to -- to refamiliarize myself with it, if that's

 7   okay.

 8       Q.   Okay.  That's no problem.  I'm going to

 9   direct you to a very specific part of it.

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 1            MR. SCHWING:  Object to form.                05:29:40

 2            THE DEPONENT:  I -- I think I recall

 3   seeing three tabs in -- in that document.  But,

 4   again, I can't be completely sure.

 5        Q.   (By Mr. Melamed)  Do you know -- sorry.      05:29:58

 6            You said you pulled -- you went to

 7   that -- to access that document via Quip; is that

 8   right?

 9        A.   Yes.  I -- I -- I accessed that document

10   via Quip.                                             05:30:18

11            (Exhibit 431 was marked for

12   identification by the court reporter and is

13   attached hereto.)

14            MR. MELAMED:  I just introduced what's

15   been marked as Exhibit 3 -- I'm sorry, 431.           05:31:00

16   Exhibit 431 is a -- is a spreadsheet FB-CA-MDL --

17            SPECIAL MASTER GARRIE:  Where do I

18   find -- where -- I can't find Exhibit 431.  I see

19   Exhibit 428.

20            MR. MELAMED:  I think you're in a             05:31:22

21   different exhibit folder.  There is deposition of

22   Simon Cross 30(b)(6).

23            SPECIAL MASTER GARRIE:  I found it.  I

24   found it.  I found it.  I was looking at it and I

25   clicked a different one.  There's six folder forms.   05:31:31
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1   My apologies for interrupting.   05:31:33

2   MR. MELAMED: So Exhibit 431 is a

3   document with the Bates FB-CA-MDL-02898670. And it

4   was attached to the Exhibit 430.

5

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23 Back to you Counsel Melamed.

24 MR. MELAMED: Thank you.

25 05:34:52

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 1    /////                                            05:34:52

 2            (Exhibit 432 was marked for

 3    identification by the court reporter and is

 4    attached hereto.)

 5            MR. MELAMED:  I just introduced what's    05:35:14

 6    been marked as Exhibit 432.  Exhibit 432 is an

 7    Excel spreadsheet.  FB-CA-MDL-02674226.

 8            The metadata associated with the document

 9    indicates that it was created on August 15th, 2018.

10    And the name of it is "20180815_nana" N-A-N-A       05:35:42

11    "ad hoc request_friends permission metadata.xlxs."

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10        Q.   Are you familiar with the app "This is        05:40:36

11    Your Digital Life"?

12        A.   I have heard of the -- of the app -- This

13    is Your Digital Life.

14        Q.   And what is your understanding -- in what

15    context have you heard of the app, This is Your        05:40:49

16    Digital Life?

17        A.   I've heard of that in the context of

18    Cambridge Analytica.

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1	A. Again, I see that in the -- in the	05:41:31
2	document.	
3	Q. Do you know how many times Facebook users	
4	downloaded This is Your Digital Life? Let me	
5	restate that.	05:41:44
6	Do you know how many Facebook users	
7	signed in to This is Your Digital Life?	
8	MR. SCHWING: Object to scope. Object to	
9	the form of the question.	
10	And, again, I think this was not an	05:41:54
11	exhibit that was identified in June 3rd, email.	
12	THE DEPONENT: I'm not aware of the	
13	number of people that have -- what was your phrase,	
14	sorry.	
15	Q. (By Mr. Melamed) Number of Facebook	05:42:13
16	users who logged in to This is Your Digital Life?	
17	A. I'm -- I'm not aware of the number of	
18	Facebook users who logged in to This is Your	
19	Digital Life.	
20	Q. I'll -- I'll represent to you that	05:42:23
21	Facebook publicly reported approximately 270,000	
22	Facebook users logged in to This is Your Digital	
23	Life.	
24	Does that sound accurate to you? Do you	
25	have any reason to doubt that?	05:42:39

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1            MR. SCHWING:  Object to the form.  It's        05:42:40

2    outside the scope of the deposition.

3            THE DEPONENT:  I have no reason to doubt

4    what you're saying.  But, again, I -- I don't

5    recall those numbers.                                 05:42:53

6        Q.   (By Mr. Melamed)  Okay.  I'm just trying

7    to establish background that would help you

8    potentially testify regarding the tracking

9    information in this.  So if that's not helpful,

10   that's okay.  And we can move on.                     05:43:14

11           (Exhibit 433 was marked for

12   identification by the court reporter and is

13   attached hereto.)

14
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11   Where did Facebook identify the

12 developers that could continue to access Graph 1.0

13 API after it was deprecated?

14   MR. SCHWING: Object to form.

15   █████████████   ████████████████   ████████

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12   MR. SCHWING: Object to form.

13   THE DEPONENT: I would speak to

14   Mr. Molaro in the first instance.

15   SPECIAL MASTER GARRIE: Counsel Melamed,   06:19:35

16   I'm going to encourage you to go to the next topic

17   since it's -- he's not an expert on it and has no

18   personal knowledge of it. And so on and so forth.

19   MR. MELAMED: Okay. Understood. I -- I

20   was trying to understand the way in which Facebook   06:19:49

21   tracks data.

22   SPECIAL MASTER GARRIE: Counsel Schwing.

23   MR. MELAMED: I'm sorry.

24   ▮▮▮▮▮▮▮▮   ▮▮▮▮▮▮

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 7           SPECIAL MASTER GARRIE:  Just because --

 8   just let me weigh in here, so we heard that.  I

 9   just want to set -- level set here.  If the

10   information exists in one source, and it is          06:21:32

11   accessible and provided it's not necessary that all

12   sources need to be searched.

13           So I just want to keep that in mind,

14   Counsel Schwing.  So before you go down the rabbit

15   hole, maybe first find out how the systems work      06:21:45

16   together and what data is in which, so that way we

17   don't have a lot of conversation about something

18   that may be encapsulated in something you've

19   already engaged with.  So just meet and confer.

20   And work that out.                                   06:21:58

21           But more importantly, let's keep on point

22   with Mr. Cross, Mr. Melamed -- or Counsel Melamed

23   and Counsel Schwing, and move to next topic.  And

24   this is noted on the record and we'll keep it

25   going.                                               06:22:09
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 1              MR. SCHWING:  Thank you.                06:22:10

 2              MR. MELAMED:  Thank you.

 3              Why don't we take a five-minute break.

 4              MR. SCHWING:  Okay.

 5              THE VIDEOGRAPHER:  Okay.  We're off the  06:22:17

 6    record.  It's 6:22 p.m.

 7              (Recess taken.)

 8              THE VIDEOGRAPHER:  We're back on the

 9    record.  It's 6:38 p.m.

10              MR. MELAMED:  So thank you for your      06:38:16

11    testimony, Mr. Cross, on topics 2 -- on behalf of

12    plaintiffs, we think we're going to need additional

13    testimony from a Facebook designee about some

14    questions you were unable to provide answers to.

15    But we'll deal with that off the record.  I just    06:38:32

16    want to establish that on the record.

17              Otherwise thank you for your time.  And I

18    understand that Mr. Loeser is going to return for

19    some follow-up questioning regarding topics 6 and

20    7 after a short break, or after a break.             06:38:48

21              MR. SCHWING:  I -- I -- this is not the

22    time or place to argue.  So we can talk about that

23    off -- offline.  Matt, we had four days of -- of,

24    you know, five days almost now testimony and we

25    will meet and confer with you about that, and,       06:39:08
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1	you know, and try to work through the issues. And	06:39:11
2	as necessary and appropriate work with the	
3	Special Master, and I'm happy to talk to you about	
4	that.	
5	MR. MELAMED: Thank you.	06:39:21
6	We can go off the record.	
7	(Discussion off the stenographic record.)	
8	THE VIDEOGRAPHER: We're off the record.	
9	It's 6:40 p.m.	
10	(Recess taken.)	06:40:21
11	THE VIDEOGRAPHER: We're back on the	
12	record. It's 7:29 p.m.	
13	EXAMINATION	
14	BY MR. LOESER:	
15	Q. It is still good morning for me,	07:37:08
16	Mr. Cross, but it's good evening for you.	
17	And I have some questions. Hopefully it	
18	won't take too long so we'll jump in and get	
19	started.	
20	Are you able to continue testifying now?	07:37:26
21	A. Yeah, let's keep going.	
22	Q. Okay. Mr. Cross, in 2018 after --	
23	MR. SCHWING: I'm sorry to interrupt you,	
24	Mr. Loeser, it's just before we -- we can either do	
25	this now or later. Before the -- the testimony	07:37:41

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1	started back up, I indicated that Mr. Cross wanted	07:37:44
2	to clarify something in his testimony. I'll leave	
3	it to you as to whether or not you want to do that	
4	now or in a little bit.	
5	MR. LOESER: If it's okay with you, I'm	07:37:55
6	fine if you want to just ask him for his	
7	clarification on -- on a redirect type basis. That	
8	I think probably works best for the record. If	
9	that works for you.	
10	MR. SCHWING: Sure. That's fine. Thank	07:38:08
11	you.	
12	Q. (By Mr. Loeser) Mr. Cross, in 2018 after	
13	the Cambridge Analytica scandal broke, Facebook	
14	received negative press about its data sharing	
15	practices with apps and partners, correct?	07:38:20
16	MR. SCHWING: Outside the scope. Object	
17	to form.	
18	THE DEPONENT: I recall a number of	
19	articles about Cambridge Analytica.	
20	Q. (By Mr. Loeser) And were any of those	07:38:36
21	articles -- would you consider any of those	
22	articles as having been negative press about	
23	Facebook's data sharing practices?	
24	MR. SCHWING: Same objections.	
25	THE DEPONENT: I recall concerns being	07:38:52

1   raised in -- in the media regarding -- regarding   07:38:54

2   the Cambridge Analytica situation, yes.

3   Q.   (By Mr. Loeser) And Mr. Cross, after the

4   Cambridge Analytica scandal broke, Facebook sought

5   to sort out and identify which apps and partners   07:39:07

6   continued to have access to friends data through

7   whitelist; is that correct?

8   MR. SCHWING: Object to form.

9   THE DEPONENT: After Cambridge Analytica

10   the company -- the company undertook a number of   07:39:24

11   efforts to -- to understand and identify

12   applications that had access to information.

13   Q.   (By Mr. Loeser) And sir, that

14   investigation looked specifically into applications

15   that had access to information through whitelists,   07:39:43

16   right?

17   MR. SCHWING: Outside the scope.

18   THE DEPONENT: My understanding is that

19   the -- the work that was done included looking at

20   the whitelists. But it also included other   07:40:01

21   areas -- areas of inquiry too.

22   Q.   (By Mr. Loeser) And, Mr. Cross, isn't it

23   the case that Facebook struggled to identify all of

24   the apps and partners that had access to friends

25   data through whitelist?   07:40:17

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1	MR. SCHWING: Vague.	07:40:20
2	THE DEPONENT: The team working on	
3	this -- this work faced -- faced a number of	
4	challenges in pulling together a complete	
5	understanding. And they -- they worked hard to do	07:40:37
6	so.	
7	Q. (By Mr. Loeser) And Mr. Cross, what were	
8	the challenges that the team investigating	
9	whitelists and specifically whitelists that	
10	provided access to friends database?	07:40:51
11	MR. SCHWING: Object to form. Outside	
12	the scope.	
13	THE DEPONENT: So I wasn't -- I wasn't	
14	there at the time, I'm afraid. But -- sorry. It's	
15	hard to comment precisely on all of the challenges	07:41:10
16	that -- that were faced at the time.	
17	Q. (By Mr. Loeser) Mr. Cross, can you	
18	testify as to any of the challenges that were faced	
19	at the time?	
20	A. So there were a number of different	07:41:30
21	whitelists in place, and different mechanisms for	
22	API access. And the team had to pull together	
23	to -- and did, in order to like fully understand	
24	API access at the time.	
25	Q. And, Mr. Cross, was one of the challenges	07:41:58

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1    faced by the team trying to identify all of the          07:42:03

2    apps and parties that were whitelisted, the result

3    of how records were kept at Facebook of

4    whitelisting?

5            MR. SCHWING:  Object to form.                     07:42:17

6            THE DEPONENT:  I can't say whether or not

7    that's the -- the challenges that the -- that the

8    team involved were -- were working through.

9        Q.   (By Mr. Loeser)  Was there one place

10   or -- or one source of information that the team        07:42:37

11   could look for to identify all of the whitelists

12   that provided access to friend data?

13       A.   My understanding is the team had to look

14   at -- at a few sources of information, and they did

15   so in order to pull together some understanding.        07:42:59

16       Q.   Was there more than one group or team

17   that could make the decision to whitelist apps and

18   partners?

19            MR. SCHWING:  Object to form.

20            THE DEPONENT:  Can you help me                   07:43:19

21   understand, what do you understand by whitelist and

22   partners in what context?

23       Q.   (By Mr. Loeser)  In the context of the

24   discussion we're having now about providing access

25   to friend data.                                          07:43:30
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1   MR. SCHWING: Object to form.   07:43:35

2   THE DEPONENT: So there were different

3   teams involved in managing access, the -- the

4   migration of the APIs in 2014 and 2015. And so

5   it's possible the number of people involved.   07:43:58

6   Q.   (By Mr. Loeser) What -- what were the

7   different teams?

8   MR. SCHWING: Object to form. Outside

9   the scope.

10   THE DEPONENT: My understanding is there   07:44:13

11   were several teams involved, the platform

12   partnerships team, for example, and we have all

13   partnerships teams, so those were two examples of

14   teams that would have been involved.

15   Q.   (By Mr. Loeser) And are those teams that   07:44:32

16   had the authority to whitelist an app or a partner

17   to have continued access to friend data?

18   MR. SCHWING: Object to form.

19   THE DEPONENT: Can you be specific about

20   the -- the time period you're talking about.   07:44:47

21   Q.   (By Mr. Loeser) The period after 2014

22   when Graph API -- AP [sic] version 2 was uploaded?

23   A.   I'm sorry, what was the original question

24   again?

25   Q.   Did each of the teams you just mentioned   07:45:09

1	have authority to whitelist apps or partners to	07:45:11
2	have continued access to APIs that emit friend	
3	data?	
4	MR. SCHWING: Object to form.	
5	THE DEPONENT: The decision to whitelist	07:45:22
6	apps for continued access to friend permissions,	
7	for example, was taken on a -- on a case-by-case	
8	basis among mul- -- multiple teams to come to a	
9	recommendation decision.	
10	Q. (By Mr. Loeser) Okay. List for me all	07:45:41
11	of the teams that had the ability to do that?	
12	MR. SCHWING: Object to form.	
13	THE DEPONENT: I wouldn't be able to,	
14	you know, a list of every single team that may have	
15	been involved. Over time I can talk to some of the	07:45:58
16	ones I've already identified. There's the platform	
17	product team, the platform partnerships teams and	
18	they're the folks that would have worked together	
19	to -- to come to a recommendation.	
20	MR. LOESER: I'm going to introduce an	07:46:22
21	exhibit which is tab 34, which you should see	
22	momentarily. And this is Exhibit 434.	
23	Q. (By Mr. Loeser) And while this is coming	
24	up, I'll tell you this is an email from Dan Rose to	
25	Ime Archibong dated 6/22/2018 subject "Re:	07:46:59

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1	V1 extensions."	07:47:03
2	Do you see that, Mr. Cross?	
3	A. I do see that.	
4	Q. Why don't you take a minute to -- to look	
5	through the email string. And I have a few	07:47:13
6	questions for you about the string.	
7	A. Sure. Thank you.	
8	MR. SCHWING: Mr. Loeser, I think for the	
9	record this was previously marked not too long ago	
10	as 433, Exhibit 433.	07:47:45
11	MR. LOESER: Thank you for that	
12	clarification. We'll correct that.	
13	MR. SCHWING: So you've -- you've now --	
14	well, you can do what you want. If you want to	
15	have it as an exhibit twice I just want to make	07:48:02
16	sure there's no confusion.	
17	MR. LOESER: Why don't we go off the	
18	record real quickly.	
19	THE VIDEOGRAPHER: Going off the record.	
20	It's 7:48 p.m.	07:48:17
21	(Recess taken.)	
22	THE VIDEOGRAPHER: We're back on the	
23	record. It's 7:50 p.m.	
24	MR. LOESER: So for the record, we just	
25	marked an exhibit and didn't realize it had just	07:50:58

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1   been marked previously today, in fact. So we will   07:51:01

2   pull down the second version of the same exhibit

3   and just refer to the originally marked version,

4   which is Exhibit 433.

5   Q.   (By Mr. Loeser) And I have a couple more   07:51:16

6   questions about this exhibit.

7   Mr. Melamed asked you a few questions

8   already. So obviously I won't reask those. But

9   fair to say -- have you had a chance to take a look

10   at this or do you recall from your earlier review   07:51:31

11   of it today what it's about?

12   A.   I have had a chance to review this just

13   now, thank you.

14

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20   Q.   (By Mr. Loeser) Mr. Cross, to prepare   07:57:11

21 for your testimony today, did you reach out to KP

22 and ask him any questions about the whitelisting

23 process or results?

24   A.   I did not speak to KP as part of my

25 preparations for today.   07:57:28

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1   Q.   Mr. Cross, can Facebook identify all apps   07:57:31

2   that had access to APIs that emit friend data post

3   2014?

4   MR. SCHWING: Object to form.

5   THE DEPONENT: Again, I think it's   07:57:49

6   important to -- I'm unclear on what you mean by

7   "friend data" in this -- in this context.

8   Q.   (By Mr. Loeser) Okay. How -- how does

9   Facebook use the term "friend data"?

10   A.   The -- Facebook has used that term in a   07:58:10

11   number of different ways. Primarily, it refers to

12   content and information posted by a user that would

13   be made available via platform.

14   Q.   So using that definition, can Facebook

15   identify all apps that had access to APIs that emit   07:58:36

16   friend data after 2014?

17   A.   So my understanding is Facebook has

18   altogether an understanding of the apps which had

19   access to -- to friend data after 2014.

20   Q.   Can Facebook identify all Facebook users   07:59:02

21   who installed apps with access to APIs that emit

22   friend data after 2014?

23   MR. SCHWING: Object to form. Outside

24   the scope.

25   THE DEPONENT: I'm not entirely confident   07:59:22

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1   that exactly what -- what Facebook can do in   07:59:24

2   that -- in that respect. Yeah, so -- so sorry.

3   I'm not sure I know what Facebook is able to do.

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21   Q.   Mr. Cross, did Aleksander Kogan's sale of

22   Facebook data he obtained from the friends of users

23   who installed the, This Is Your Digital Life app,

24   exceed the use case for the app?

25   MR. SCHWING: Outside the scope of the   08:06:10

                                                                  Page 1155

1	deposition and object to form.	08:06:12
2	THE DEPONENT: That seems to be a	
3	question about platform policy as -- as written,	
4	which is not something I'm -- I'm particularly well	
5	qualified to -- to provide an opinion on. I think	08:06:30
6	the best person to ask that question to would be	
7	Ally Hendrix.	
8	SPECIAL MASTER GARRIE: Mr. Cross, while	
9	I appreciate you telling who's the -- are you	
10	saying in your 30(b)(6) capacity that's who you	08:07:01
11	believe is the best person. You're not -- you're	
12	not able to answer that question today as you sit	
13	here, is that -- I was just reading the transcript.	
14	So I'm a second behind, but I want to make sure I	
15	understood your answer.	08:07:18
16	Can you answer that question or not, as	
17	the 30(b)(6) capacity, right, let's be clear.	
18	MR. SCHWING: Yeah, and -- and we've got	
19	a scope objection there.	
20	SPECIAL MASTER GARRIE: Yeah, with the	08:07:37
21	scope objections noted on the record. I just --	
22	Mr. Cross?	
23	THE DEPONENT: Yeah, that -- that --	
24	SPECIAL MASTER GARRIE: If you're not	
25	prepared -- like let me be clear. There's three	08:07:49

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1	possible answers. I'm not prepared to answer the	08:07:52
2	question. I am prepared to question [sic]. I	
3	don't understand the question.	
4	THE DEPONENT: Yeah, I'm not prepared to	
5	answer the question. I think that's a question	08:07:59
6	about platform policy and it's determination of the	
7	platform policy, which is not something that I'm	
8	prepared to testify on.	
9	SPECIAL MASTER GARRIE: And that's what I	
10	thought I understood your answer as. I just wanted	08:08:09
11	to clarify it for the record. Thank you.	
12	Back to you, Counsel Loeser.	
13	Q. (By Mr. Loeser) And regardless of	
14	whether you -- you believe you're prepared as a	
15	30(b)(6) witness to testify to that or not which is	08:08:18
16	a question I suppose for another day, can you	
17	answer the question?	
18	A. You're asking me in a personal capacity	
19	to answer the question?	
20	Q. I'm just asking you to answer the	08:08:35
21	question. In what capacity you answer it I suppose	
22	is something that can be determined. But I would	
23	like for you to answer the question.	
24	MR. SCHWING: Outside of the scope.	
25	Object to form.	08:08:48

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 1        THE DEPONENT:  Yeah, I can try answering          08:08:51

 2   the question again.  We've had a number of things

 3   go by, and if I'm going to try to answer it, I

 4   should hear it again.

 5

25        Q.   (By Mr. Loeser)  Okay.  Can you answer        08:09:58
```

1   the question?   08:09:59

2   A.   Again, I don't feel like I can answer the

3   question. As -- it would require me to have,

4   you know -- interpret policy which is not something

5   that I'm -- I'm an expert in being able to do.   08:10:10

6   Q.   So you're not able to answer that

7   question.

8   MR. SCHWING: Same objections.

9   THE DEPONENT: Yeah, I don't -- I don't

10   feel -- I don't feel comfortable giving an answer   08:10:25

11   to that question given -- I'm just not that well

12   versed in Facebook's platform policy. And I want

13   to make sure that you get the right answers to your

14   questions.

15   MR. SCHWING: Special Master Garrie, may   08:10:42

16   I make a Rule 30 motion without Mr. Cross present.

17   SPECIAL MASTER GARRIE: Yeah, Mr. Cross

18   you can -- can you go to the break out room.

19   THE DEPONENT: Sure.

20   MR. SCHWING: Special Master Garrie,   08:11:03

21   Mr. Loeser is supposed to be asking questions about

22   topics 6 and 7. Mr. Cross is not designated to

23   discuss the use-case issues that are being asked

24   about. He's made that clear, but Mr. Loeser

25   continues to ask the questions.   08:11:18

                                                   Page 1159

1	Mr. Cross is going to be providing	08:11:20
2	another deposition later in his personally	
3	capacity. We've been going for now, you know, near	
4	five days and we need to try to finish. So I would	
5	request some relief here that we try to speed this	08:11:32
6	along on the topics he's actually designated for.	
7	MR. LOESER: May I be heard,	
8	Special Master Garrie.	
9	SPECIAL MASTER GARRIE: Yeah.	
10	MR. LOESER: So I'm asking questions that	08:11:43
11	are specifically and directly about friend sharing	
12	and whitelisting. And friend sharing is what	
13	Cambridge Analytica is all about. The notice, in	
14	fact, refers to use cases with regard to	
15	whitelisting which is what I'm about to ask further	08:11:56
16	questions on. I don't have more questions about	
17	Cambridge Analytica. So we can move on from that.	
18	But it is simply not true that questions	
19	about Cambridge Analytica which is friend sharing,	
20	the whole scandal friend sharing, does not relate	08:12:08
21	to the topic of friend sharing identified in the	
22	notice.	
23	So I don't think we need to have a long	
24	fight about it because I don't have further	
25	questions about the use-case issue regarding friend	08:12:16

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1	sharing, but I do have some additional questions	08:12:21
2	about use case relating to whitelisting because	
3	it's specifically identified in --	
4	SPECIAL MASTER GARRIE: It does state it	
5	in the notice.	08:12:27
6	Counsel Schwing, any comment?	
7	MR. SCHWING: So topic 6 is related to	
8	the development of friend sharing, that's the	
9	topic, the development of friend sharing. So this	
10	is, you know, what we ought to be focused on. I	08:12:45
11	don't see -- so where -- where is this bit about --	
12	the use case that you're talking about.	
13	MR. MELAMED: 7A says and whether the	
14	access granted exceeded the use case.	
15	MR. SCHWING: Okay. And 7 is, the topic	08:13:03
16	is the decision to whitelist particular apps or	
17	partners.	
18	MR. LOESER: That's what I'm about to	
19	talk about --	
20	MR. SCHWING: Sorry. Please let me	08:13:14
21	finish, Mr. Loeser.	
22	MR. LOESER: Sorry.	
23	MR. SCHWING: The decision to whitelist	
24	particular apps or partners and how Facebook	
25	determined which entities to whitelist.	08:13:18

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1	So the topic is not sort of anything and	08:13:20
2	everything ever to do with, you know, about	
3	whitelisting. It's a specific narrow topic. It	
4	sounds like Mr. Loeser is moving -- moving along	
5	and I -- I think we all share a mutual interest	08:13:32
6	in -- in finishing. I just want to make sure that	
7	we're not --	
8	SPECIAL MASTER GARRIE: I agree. I am	
9	ready to rule.	
10	So Mr. Loeser, your questions he's	08:13:40
11	answered them. They are gracefully in a gray zone	
12	that will bear into an area where it will prove	
13	more problematic for you. So if you're moving to	
14	the next set of questions as 7A dictates you're	
15	more than welcome to cover that topic as indicated	08:13:58
16	and as defined. I don't have any problems with	
17	that. And I think that is appropriate.	
18	So I will move -- we will move forward	
19	with the questions. But friend sharing does relate	
20	to a use case under 7A, under whitelisting	08:14:15
21	defend- -- depending -- the definition of	
22	whitelisting is defined as what Mr. Loeser --	
23	Counsel Loeser?	
24	MR. LOESER: Whitelisting is providing --	
25	Mr. Cross has defined it as providing access to	08:14:33

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1   nonpublic APIs and private APIs, so...   08:14:35

2   I mean, I -- that's what I'm asking

3   about. And --

4   SPECIAL MASTER GARRIE: I get it. I

5   agree. So that's fine. We'll move along. I think   08:14:45

6   that makes sense.

7   Counsel Schwing, we'll move it along. I

8   agree. But I do think that there is a pretty wide

9   birth under 7A for as long as it stays focused on

10   the whitelisting topic. And I think it's within   08:15:01

11   the scope of, while narrow is very specific in --

12   in its application.

13   Any last comments, Counsel Schwing or...

14   MR. SCHWING: Yeah, I mean, I think all

15   of 7 kind of ties back to the beginning of it which   08:15:24

16   is the decision to whitelist particular apps or

17   partners and how Facebook determined which entities

18   to whitelist. You know, the issues about exceeding

19   the use case. I mean, there's a whole -- there was

20   a whole separate deposition about that.   08:15:41

21   SPECIAL MASTER GARRIE: Yeah.

22   MR. SCHWING: And so look, I think we can

23   move along. I just -- to the extent that they're

24   repeated questions about, you know, that he's --

25   SPECIAL MASTER GARRIE: Let me put it to   08:15:51

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1	you differently. I agree with Counsel Schwing in	08:15:52
2	the fact that when you ask a question	
3	Counsel Loeser, and he says "I'm not here to	
4	testify about it." And then he says it again "I'm	
5	not here to testify about it."	08:16:00
6	That should be sufficient for you to move	
7	onto another question and keep it moving forward,	
8	generally speaking. Or you can make a motion or	
9	Rule 30 motion and we go and excuse the witness and	
10	discuss it future. But I don't think asking the	08:16:15
11	witness the same thing will prove to be effective.	
12	MR. LOESER: Yeah, that -- that's fine.	
13	I mean, you know, typically a scope objection is	
14	made, 30(b)(6) witnesses testify all the time.	
15	There's always a fight about whether it's in scope	08:16:29
16	or out of scope and if they provide what becomes	
17	personal testimony there's nothing. That's just	
18	how it -- how it works.	
19	I'd also just note just so it's clear, I	
20	think Mr. Schwing and I have a slightly different	08:16:39
21	understanding of how a notice operates under	
22	30(b)(6). The law is quite clear that it sets the	
23	minimum not the maximum of what you can ask about.	
24	SPECIAL MASTER GARRIE: I'm -- I'm not --	
25	I'm not talking about scope. I'm talking about	08:16:49

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 1   form.                                           08:16:51

 2            What I'm saying is, if you want to ask in

 3   your personal capacity or in your non30(b)(6)

 4   capacity to get -- he said, "I'm not here to

 5   testify in my" -- as -- "as a representative of   08:17:00

 6   Facebook to answer this question."

 7            You said, "Will you answer this

 8   question."

 9            And then he said, "Do you mean in my

10   personal capacity?"                              08:17:09

11            And your response was "Just answer the

12   question."

13            So if you want him to answer the question

14   in his personal capacity, he will.  But he will not

15   answer -- and that resulted in a circular set of   08:17:19

16   questions where you asked him again the exact same

17   question and ended up at the exact same point.

18            So you would need to offer that

19   clarification because he has answered the question

20   as he understood it, which was you are asking him   08:17:30

21   in his professional 30(b)(6) capacity.  Which is

22   why he answered it accordingly.  Whether you agree

23   or not, that was the answer provided.  We went in a

24   circle and got back to the same point.

25            MR. LOESER:  Yeah, well, fortunately I    08:17:44
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1	don't have any more questions on that. And I do	08:17:44
2	have questions on whitelisting and use cases --	
3	SPECIAL MASTER GARRIE: That's fine.	
4	Let's get it on the road. Show on the road.	
5	MR. LOESER: I think Austin and I have a	08:17:53
6	common and -- and clear desire to make this	
7	deposition over with. So --	
8	MR. SCHWING: This is --	
9	SPECIAL MASTER GARRIE: Let's be clear	
10	I -- I'm not opining with the minimum or maximum.	08:18:01
11	I am opining, though, with the format -- the form	
12	of how it goes. So we'll get the witness back.	
13	But just keep that in the back of your mind,	
14	Counsel Loeser --	
15	MR. LOESER: Sure.	08:18:13
16	SPECIAL MASTER GARRIE: -- that if it	
17	happens again I'll cut it off, and I'll just tell	
18	you to ask the next question. Or you can tell him	
19	in your personally capacity. Because you have to	
20	explain to the witness the question you're asking	08:18:20
21	so he can then answer the question. He couldn't	
22	answer the question because he didn't understand	
23	how you were asking him.	
24	MR. LOESER: Understood.	
25	SPECIAL MASTER GARRIE: Okay.	08:18:30

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 1            MR. SCHWING:  I'll go get Mr. Cross here        08:18:31

 2    and we'll get back.  Yeah.  I mean, look, I want to

 3    get done too.  This is, you know, nobody wants to

 4    prolong this.  So okay.  Let me -- I need to go

 5    tell my housekeeper to stop vacuuming, and then I        08:18:40

 6    will be right back.

 7            SPECIAL MASTER GARRIE:  Okay.

 8            THE VIDEOGRAPHER:  Go off the record?

 9            SPECIAL MASTER GARRIE:  Go off the record

10    for two minutes I guess.                                 08:18:53

11            THE VIDEOGRAPHER:  Okay.  We're off the

12    record.  It's 8:18 p.m.

13            (Recess taken.)

14            THE VIDEOGRAPHER:  We're back on the

15    record.  It's 8:23 p.m.                                  08:23:24

16    ███  ██████████  ██████████

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19   Q.   (By Mr. Loeser) Mr. Cross, topic --

20   topic 7B asks for "the most efficient way to   08:27:17

21   establish payments, revenues, exchanged value

22   actual or promised, that Facebook received for" --

23   "for permitting whitelisting capabilities."

24   And in your preparations for your

25   testimony for this -- on this topic, did you   08:27:54

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1	investigate that question?	08:27:59
2	A. I spoke to a number of people involved in	
3	the API changes and in around 2014 and '15 to	
4	understand their understanding of how decisions	
5	were made.	08:28:26
6	Q. And specifically with regard to payments,	
7	revenues, exchanged value actual or promised, who	
8	did you talk to to drill down on whether any such	
9	payments, revenues, exchanged value actual or	
10	promised were provided to Facebook for permitting	08:28:44
11	whitelisting?	
12	A. I spoke to Ime Archibong. I spoke to	
13	Francisco Varela, and those are the two names off	
14	the top of my head. I spoke to a number of people	
15	involved in this -- in preparation for today.	08:29:08
16	Q. Did you speak to anyone who worked on	
17	the -- in an advertising department at Facebook?	
18	A. Did I speak to anyone in advertising	
19	department.	
20	Q. Or more broadly, anyone that -- that was	08:29:30
21	involved in the business of advertising on the	
22	Facebook platform?	
23	A. I spoke with Vatsal Mehta. Who's	
24	involved in -- in that side of the company as I	
25	understand it.	08:29:49

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1   Q.   Okay. And what -- what did -- is that   08:29:49

2   a -- what was that person's name, I'm sorry?

3   A.   Vatsal Mehta.

4   Q.   Could you spell the first name.

5   A.   V-A-T-S-A-L. The surname is Mehta.   08:30:07

6   M-H-E-T-A [sic] I think.

7   Q.   And what did you learn from Mr. Mehta?

8   A.   He was not able to identify for me

9   examples of how Facebook received payments for

10   whitelisting.   08:30:34

11   Q.   Now, the next paragraph clause in the

12   notice says "and the revenues and net profits

13   Facebook recognized related to whitelisting through

14   the class period."

15   Did you investigate anything of value   08:30:54

16   received by Facebook that related to whitelisting?

17   MR. SCHWING: Outside the topic.

18   THE DEPONENT: Again, I spoke to a number

19   of people who were involved in whitelisting and

20   partnerships to understand if they had any   08:31:19

21   understanding of value received or payments made.

22   MR. LOESER: All right. If we can put up

23   Exhibit 339.

24   Q.   (By Mr. Loeser) Mr. Cross, I'm showing

25   you what was previously marked as Exhibit 339.   08:32:03

                                                    Page 1171

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1 ⬛⬛⬛⬛⬛⬛⬛⬛⬛⬛   ⬛⬛⬛

2   Q.   And that's why you didn't talk to her?

3   A.   My understanding is that yes, because she

4   is not employed at Facebook and it's not

5   appropriate to reach out to her.   08:35:20

6   Q.   Did you talk to or seek to find out if

7   anyone else received this PowerPoint who still

8   works at Facebook?

9   A.   I didn't, like, try and understand who

10 else might have received this PowerPoint. However,   08:35:44

11 I have spoken to Mr. Archibong who likely may have

12 received this -- this PowerPoint at some time.

13   Q.   And did you talk to him about this

14 PowerPoint?

15   A.   I talked to him about the -- his   08:36:04

16 understanding of how valuations were -- were made

17 about apps to whitelisting.

18   Q.   But did you talk to him specifically

19 about this PowerPoint?

20   A.   I don't recall showing this PowerPoint to 08:36:21

21 Mr. Archibong, but we talked in general about the

22 topics contained within.

23   Q.   Did you talk to him about what Facebook

24 had to lose if certain partners stopped using the

25 Facebook platform?   08:36:36

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1	MR. SCHWING: Object to form.	08:36:40
2	THE DEPONENT: We discussed whether or	
3	not, what the potential implications of the changes	
4	might be and how Facebook -- how he and his	
5	partnerships team thought about those potential	08:36:56
6	changes.	
7	Q. (By Mr. Loeser) That's not quite what I	
8	asked you. So I will -- if you can answer the	
9	question I had asked I would appreciate it. Which	
10	if I could get this computer to work I read back to	08:37:13
11	you.	
12	MR. SCHWING: The court reporter could --	
13	MR. LOESER: Yeah, I have it now. I'm	
14	sorry, Austin. I didn't mean to interrupt you.	
15	MR. SCHWING: Yeah, if -- if you could	08:37:25
16	read it again that would be wonderful, thank you.	
17	Q. (By Mr. Loeser) Did you talk to	
18	Mr. Archibong about what Facebook had to lose if	
19	certain partners stopped using the Facebook	
20	platform?	08:37:38
21	MR. SCHWING: Object to form.	
22	THE DEPONENT: We talked about -- me and	
23	Mr. Archibong talked about the potential	
24	implications for the developing ecosystem from	
25	these changes that were proposed at the time.	08:37:54

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 1        Q.   (By Mr. Loeser)  And Mr. Cross, did that      08:37:57

 2   include what Facebook had to lose if certain

 3   partners stopped using the platform?

 4             MR. SCHWING:  Object to form.

 5             THE DEPONENT:  We talked about the            08:38:11

 6   potential impact to developers and -- and the

 7   developer ecosystem which would be an impact on --

 8   on Facebook.

 9        Q.   (By Mr. Loeser)  Mr. Cross, I'm just

10   trying to get a straightforward yes-or-no answer to    08:38:26

11   a straightforward question.

12             So I'll ask again.  And if you could just

13   answer, we can move on to the next question.

14             Do you need me to read back the question

15   again?                                                 08:38:41

16        A.   So we talked about the -- you're using a

17   phrase that -- "what do we have to lose."  Do I

18   recall using that specific phrase with

19   Mr. Archibong, I don't recall using that specific

20   phrase in that conversation with him.                  08:38:53

21             But I do recall we talked about his

22   understanding of the discussions at the time as to

23   the impact on Facebook and third-party developers

24   of the changes, which would encompass things that

25   the company might have to deal with and the value      08:39:16
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1	that the company might lose.	08:39:22
2	Q. And, again, so the record is clear, you	
3	did not talk to him specifically about this	
4	PowerPoint, correct?	
5	A. I did not talk to Mr. Archibong	08:39:30
6	specifically about this PowerPoint. But we -- we	
7	talked about the general topics contained within	
8	which was important for me to help prepare myself	
9	for -- for today's testimony.	
10	Q. Now for a PowerPoint -- for a PowerPoint	08:39:43
11	like this, would that have been a formal task or	
12	Quip generated in connection with the project?	
13	MR. SCHWING: Object to form. Outside	
14	the scope.	
15	THE DEPONENT: Yeah, I can't say exactly	08:39:58
16	what the -- the partnerships team would have	
17	operated at this time and whether or not they'd	
18	have other documentation. Typically somebody	
19	would -- would be asked to work on something and	
20	work on it. I'm not able to say whether or not in	08:40:18
21	this case there were other tasks and documents.	
22	Q. (By Mr. Loeser) Did you search for a	
23	formal task generated in connection with this	
24	project?	
25	A. I did not search for a task in	08:40:39

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1	relationship to this specific deck.	08:40:41
2	Q. How about a Quip?	
3	A. I did not search for a Quip relating to	
4	this specific deck either.	
5	Q. And were you able to determine what, if	08:40:57
6	anything, was done with this evaluation that's	
7	contained in this PowerPoint by Facebook?	
8	MR. SCHWING: Object to form.	
9	THE DEPONENT: In talking to the -- to	
10	the people involved, my understanding is that	08:41:16
11	this -- this PowerPoint does not -- was -- did not	
12	go on to be used to determine which apps should or	
13	should not be whitelisted.	
14	Q. (By Mr. Loeser) And yet you didn't talk	
15	about the PowerPoint specifically with anyone that	08:41:33
16	you talked to to prepare for your testimony, right?	
17	MR. SCHWING: Object to form.	
18	THE DEPONENT: I spoke to Mr. Archibong	
19	about his recollection around the time and how	
20	decisions were made, and he does not recall a	08:41:52
21	formal framework being used ultimately to make --	
22	make decisions.	
23	Q. (By Mr. Loeser) You didn't say	
24	Mr. Archibong, have you seen this PowerPoint	
25	before, right?	08:42:08

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1   MR. SCHWING: Asked and answered.   08:42:15

2   THE DEPONENT: As I said, I did not show

3   this PowerPoint to -- to Mr. Archibong.

4   Q.   (By Mr. Loeser) You didn't say

5   Mr. Archibong, what do you think about the analysis   08:42:22

6   that's contained in the PowerPoint, right?

7   A.   Me and Mr. Archibong talked about how,

8   his recollection of how decisions were made and

9   ultimately what considers -- and what factors and

10   considerations were -- were included. I -- I did   08:42:45

11   not specifically show him this PowerPoint.

12   Q.   Mr. Cross, isn't it a fact that Facebook

13   treated certain developers specially based on their

14   value to Facebook and ad spend?

15   MR. SCHWING: Object to form.   08:43:07

16   THE DEPONENT: It's true that Facebook

17   whitelisted certain apps for having access to

18   additional information. But I'm -- I'm not aware

19   of -- in terms of the friends' information whether

20   or not that was in any way related to -- to   08:43:34

21   ad spend.

22   Q.   (By Mr. Loeser) And so you don't know

23   one way or the other?

24   MR. SCHWING: Object to form.

25   THE DEPONENT: Sorry, I'm not sure I   08:43:46

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1   understand.   08:43:48

2   Q.   (By Mr. Loeser)   So you don't know if, in

3   fact, certain developers were treated specially

4   based on their value to Facebook and ad spend,

5   right?   08:43:59

6   MR. SCHWING: Object to form.

7   THE DEPONENT: Are you talking to the

8   people involved in terms of apps that were

9   whitelisted for extensions or exemptions to API

10   version 1, there was -- from the people I've spoken   08:44:15

11   to, there is nothing about their impact on ad spend

12   that was involved in the decision to whitelist

13   them.

14   Q.   (By Mr. Loeser)   And is that a question

15   that you asked?   08:44:34

16   A.   Yes, I asked people whether or not they

17   recall revenue being involved in the ultimate

18   decision to whitelist apps for access to friend

19   data, and I was not able -- everybody suggested to

20   me that -- that I spoke to that that was not the   08:44:56

21   case.

22   Q.   And the people that you spoke to are

23   Ime Archibong and who else?

24   A.   I spoke to Ime Archibong. I spoke to

25   Francisco Varela, and a number of other people   08:45:20

                                                             Page 1180

1   whose -- whose names in relation to this, I can't   08:45:26

2   recall right now.

3   Q.   And did you ask them if ad spend was

4   taken into the account in the decision to whitelist

5   any partners?   08:45:35

6   A.   Yes, my understanding is that from --

7   from the people I spoke to, ad spend was -- was not

8   taken into account in a decision to whitelist

9   anyone for an extension to -- or exemption from

10   the -- the changes in API version 1 to 2 with   08:45:56

11   respect to friends data.

12   Q.   And who specifically told you ad spend

13   wasn't taken into account?

14   A.   Mr. Archibong talked to me about ad spend

15   not being a deciding factor. I'm sorry, he was one   08:46:17

16   of people who said that.

17   Q.   And you said "deciding factor."

18   Does that mean the same thing to you as

19   taken into account?

20   A.   Yes, that would mean the same thing to me   08:46:34

21   as taken into account in terms of the ultimate

22   decision to grant access.

23   Q.   And have you examined the number of

24   whitelisting partners that had significant ad spend

25   on the Facebook platform?   08:46:52

1   MR. SCHWING: Object to form.   08:46:55

2   THE DEPONENT: I'm not sure what you mean

3   by partners who have significant ad spend on the

4   Facebook platform.

5   Q.   (By Mr. Loeser) Okay. How would you   08:47:08

6   describe partners paying money to Facebook for

7   advertising on the platform?

8   MR. SCHWING: Object to form.

9   THE DEPONENT: So companies often buy ads

10 with Facebook, and that's handled by the -- the   08:47:28

11 advertising arm of the business. So I think that's

12 what we mean...

13   Q.   (By Mr. Loeser) Okay. And has Facebook

14 examined the number of whitelisted partners that

15 paid money to Facebook for advertising on the   08:47:45

16 Facebook platform?

17   MR. SCHWING: Object to form.

18   THE DEPONENT: I mean, many organizations

19 spend -- spend money with Facebook on -- in some

20 way. So I'm kind of -- I'm not entirely sure how   08:48:04

21 to answer the question.

22   Q.   (By Mr. Loeser) Well, let me ask it

23 again. And I -- it's -- I'm trying to ask you a

24 very straightforward simple question, which is just

25 if Facebook has examined the number of whitelisted   08:48:13

1	partners that paid money to Facebook to advertise	08:48:20
2	on the Facebook platform, is that an examination	
3	that Facebook has conducted?	
4	MR. SCHWING: Vague.	
5	THE DEPONENT: I'm not aware of -- of a	08:48:35
6	specific evaluation that was done with respect to	
7	whitelisting parties and ad spend.	
8	Q. (By Mr. Loeser) Is that an evaluation	
9	that Facebook is capability of doing?	
10	MR. SCHWING: Object to form. Outside	08:48:56
11	the scope.	
12	THE DEPONENT: I don't know exactly how	
13	our -- our advertising systems work. I -- I'm not	
14	sure -- I wouldn't be able to confirm if that's	
15	something Facebook would be able to do.	08:49:10
16	Q. (By Mr. Loeser) Who would you ask to	
17	find out if that's an analysis that Facebook was	
18	capable of doing?	
19	A. Again, I'm not entirely clear on the --	
20	the analysis that -- that was suggesting could be	08:49:36
21	done. So it's hard for me to suggest what I would	
22	do next. This is relatively vague in terms of,	
23	like, the time and objectives that we were	
24	suggesting.	
25	Q. Does Facebook keep track of the amount of	08:50:03

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1	money that its partners pay to Facebook?	08:50:05
2	MR. SCHWING: Outside of the scope.	
3	THE DEPONENT: Can you help me understand	
4	by what you mean by "partners and pay," in what	
5	context?	08:50:23
6	Q. (By Mr. Loeser) In the context of the	
7	conversation we're having about whitelisted	
8	partners. And, again, I'm just trying to sort out	
9	what Facebook is capable of identifying.	
10	So tell me if I'm wrong. Facebook keeps	08:50:34
11	track of money received from any partners,	
12	including its whitelisted partners, right?	
13	A. Again, Facebook keeps -- Facebook will	
14	track revenue spent on ads by -- by corporations	
15	and companies and -- and entities. So that's part	08:50:57
16	of the standards -- Facebook's standards --	
17	standard business practices for running an ad	
18	system.	
19	By "partners," I assume you mean entities	
20	that Facebook worked with as part of the Facebook	08:51:14
21	developer platform. And so if -- if that's what	
22	you mean -- well, first of all is that what you	
23	mean?	
24	Q. Here's what I mean. Facebook has	
25	identified all of the apps and partners that it	08:51:30

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 1    whitelisted for access to friend data, right.  We        08:51:34

 2    went through that the other day.

 3         A.   Yes, Facebook has -- has enacted an

 4    exhaustive effort to identify apps and partners

 5    that were whitelisted for access to friend data.          08:51:47

 6         Q.   So what would Facebook need to do to also

 7    identify for those very same entities the revenue

 8    spent on ads on the Facebook platform?

 9              MR. SCHWING:  Outside the scope.  Object

10    to form.                                                  08:52:04

11              THE DEPONENT:  Again, in that context,

12    it's hard for me to know exactly what -- what

13    Facebook would do.  Apart from the -- but the

14    conversation with the -- between the -- the teams

15    that run the Facebook advertising business and the        08:52:25

16    teams that maintain the Facebook developer

17    platform.

18
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9   Q.   And how about between March of 2018 and

10   January 2020, how many apps or partners continued   09:05:06

11   to have access to those capabilities during that

12   timeframe, do you know that?

13   A.   The process to wind down partner

14   integrations began in April 2018 and continued over

15   2018 and early 2019. Exactly I can't remember the   09:05:29

16   exact numbers of -- of which apps were -- were

17   included. But my understanding is that that

18   program or the whitelisting program was wound down

19   probably by the end of 2018.

20   Q.   And, Mr. Cross, are there any other ways   09:05:53

21   that friend data is emitted by Facebook other than

22   those that you've described that are ongoing?

23   A.   The answer to that question is -- is a

24   little complicated depending on the precise --

25   precise definition of -- of friend data.   09:06:14

                                                Page 1193

1   And so -- so that makes it hard to answer   09:06:17

2   your question in -- in the affirmative.

3   Q.   Okay. Well, what are the ways in which

4   friend data is still emitted? And if to answer

5   that question you have to explain what friend data   09:06:38

6   means in that context, please do so.

7   A.   So using the definition of -- of friend

8   data which is information -- somebody else's

9   information which a user emits or could emit to a

10   third-party application by nature of them being a   09:07:01

11   friend, my understanding is that Facebook has

12   removed all the ways in which a users friends data

13   would be emitted to a third-party app to the nature

14   of them being a friend.

15   Q.   Okay. And you said that your answer   09:07:25

16   "depended on how you define friend data."

17   So is there another definition of friend

18   data that you have in mind which if applied would

19   lead you to testify that friend data continues to

20   be emitted now?   09:07:40

21   A.   Again, it's -- it depends what you mean

22   by what's meant by friend data. What I'm referring

23   to here is information that's posted or entered by

24   a users friend, which would be emitted by the

25   nature of them being a friend to a third party.   09:08:08

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1   Q.   And, again, I'm just trying to understand   09:08:20

2   your earlier testimony.

3   So is there some other type of friend

4   data that continues to be emitted today?

5   A.   For example, if I managed a page and I   09:08:37

6   had an app managing my page, and one of my friends

7   posted publicly on that page, it's possible that an

8   app would have access to that public content.

9   So that's the example of -- of

10   information that's about a friend which might be   09:09:03

11   emitted.

12   Q.   Can you think of any other examples?

13   A.   That's really the -- the example I can

14   think of.

15   Q.   Mr. Cross, I asked you previously about   09:09:22

16   the factors that led Facebook to deprecate APIs

17   that emit friend data after the Cambridge Analytica

18   scandal, and you were not prepared at the time to

19   testify; however, I understand that you are now

20   able to testify to that. If I -- if I understand   09:09:36

21   that correctly, could answer that question?

22   MR. SCHWING: Object to the form of the

23   question.

24   Derek, I hesitate here, but let me just

25   try to be helpful. And in the interest -- I   09:09:58

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 1    just -- if -- if you can just ask him the question      09:10:02

 2    as opposed to --

 3             MR. LOESER:  Sure.  Sure.

 4             MR. SCHWING:  -- having representations

 5    of counsel that's my problem with it, okay.             09:10:05

 6             MR. LOESER:  Yeah, and I appreciate that.

 7    And I'm not trying to pick a fight with you.  I was

 8    just trying to make sure that --

 9             MR. SCHWING:  Yeah.  No, I --

10             MR. LOESER:  I'm not trying to ask him         09:10:14

11    questions that he's not able to answer.  I'm trying

12    to --

13             MR. SCHWING:  Yeah.

14             MR. LOESER:  -- ask questions now which

15    he is able to answer based on our communications.       09:10:17

16        Q.   (By Mr. Loeser)  So let me just ask

17    again.
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11   Q.   Mr. Cross, was it wrong for Facebook to

12   publicly state it was getting rid of apps ability

13   to get Facebook user data from users friends when,

14   in fact, it continued to allow a number of apps to

15   do just that?   09:12:05

16   MR. SCHWING: Lacks foundation. Vague.

17   Outside of the scope of the deposition.

18   THE DEPONENT: I'm not aware of

19   statements that were made -- statements that

20   Facebook has made to -- to that effect.   09:12:22

21   Q.   (By Mr. Loeser) Respectfully, Mr. Cross,

22   that's not the question I asked you.

23   So I'll ask the question again, and if

24   you can answer the question, I would appreciate it.

25   Was it wrong for Facebook to publicly   09:12:37

                                              Page 1197

1	state it was getting rid of apps ability to get	09:12:39
2	Facebook user data from users friends when, in	
3	fact, Facebook continued to allow a number of apps	
4	to do just that?	
5	MR. SCHWING: Outside of the topics of 6	09:12:53
6	and 7.	
7	THE DEPONENT: Again, I'm not aware of --	
8	of a statement that -- that Facebook's made to --	
9	that would indicate Facebook believes that that's	
10	the case.	09:13:07
11	Q. (By Mr. Loeser) Mr. Cross, I'm not	
12	asking you if you're aware of the statement	
13	Facebook has made. I'm asking you as Facebook's	
14	corporate designee, whether it was wrong for	
15	Facebook to publicly state it was getting rid of	09:13:17
16	apps ability to get Facebook user data from the	
17	users friends when, in fact, Facebook continued to	
18	allow a number of apps to do just that?	
19	MR. SCHWING: Vague. Lacks foundation.	
20	Outside the scope of the definition.	09:13:32
21	THE DEPONENT: I -- I -- I'm afraid, I	
22	don't work in -- in corporate communications, and	
23	so I'm not an expert in what statements Facebook	
24	made or should have made around -- around this	
25	time. As I said, I'm not aware of statements that	09:13:52

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1	Facebook has made to indicate that.	09:14:00
2	Q. (By Mr. Loeser) And, Mr. Cross, are you	
3	unable to testify as Facebook's corporate designee	
4	as to whether it was wrong for Facebook to state it	
5	was getting rid of apps ability to get Facebook	09:14:11
6	user data from a users friends when, in fact,	
7	Facebook continued to allow a number of apps to do	
8	just that?	
9	MR. SCHWING: Outside of the scope of	
10	topics 6 and 7. And lacks foundation.	09:14:24
11	THE DEPONENT: As I said like -- I'm	
12	not -- I don't feel comfortable giving an answer on	
13	behalf of the company there. I've given -- I'm not	
14	an expert in, or I'm not really working in	
15	corporate communications or -- really have the	09:14:46
16	expertise required to -- to answer that question	
17	like that, I'm afraid.	
18	Q. (By Mr. Loeser) Mr. Cross, you testified	
19	that one reason Facebook gave third parties access	
20	to friend information after 2014 was to avoid	09:15:07
21	breaking the user experience, right?	
22	MR. SCHWING: Object to form.	
23	THE DEPONENT: I recall we -- we were	
24	discussing the -- the reasons for giving some apps	
25	additional time to migrate between API version 1	09:15:28

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1   and version 2.   09:15:33

2   Q.   (By Mr. Loeser) So that the user

3   experience will not be broken?

4   MR. SCHWING: Object to form.

5   THE DEPONENT: My understanding is --   09:15:39

6   sorry. My understand is that's one of the reasons

7   why Facebook allowed apps extra time to transition

8   from version 1 to version 2.

9   Q.   (By Mr. Loeser) So for third parties who

10   received friend information after 2014, their user   09:15:56

11   experience was not broken, right?

12   MR. SCHWING: Object to form.

13   THE DEPONENT: So I'm not -- I'm not sure

14   I understand the question since -- can you -- I'm

15   not sure I understand the question.   09:16:13

16   Q.   (By Mr. Loeser) You understand what it

17   means to break the user experience, right?

18   A.   Different applications behave in

19   different ways when the API is -- is changed for

20   them.   09:16:28

21   Q.   And APIs that -- that apps that depend on

22   friend information if the friend information no

23   longer is available that breaks the user

24   experience, right?

25   A.   It could break the user experience.   09:16:41

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1   Again, the precise way in which the application was   09:16:43

2   effected would be different from application to

3   application.

4   Q.   Okay. But for an app that depends upon

5   friend data, if that app was continued to   09:16:53

6   allowed -- continued to have access to friend data,

7   than the user experience would not be broken,

8   right?

9   MR. SCHWING: Object to form.

10   THE DEPONENT: Typically where an app is   09:17:08

11   built to work with a particular version of an -- or

12   a particular way an API works and then that API

13   doesn't change, then the behavior of the app also

14   would not change.

15   Q.   (By Mr. Loeser) Okay. And there were   09:17:23

16   many third-party applications who before 2015

17   relied on nonapp friend information for their user

18   experience, right?

19   A.   There were applications built prior --

20   prior to 2014 which reviewed friends information in   09:17:41

21   various ways.

22   Q.   And not just various ways but for the

23   user experience, right?

24   A.   Some apps would have used that

25   information very much in the user experience.   09:18:01

                                                        Page 1201

1   Q.   Mr. Cross, not all those third parties   09:18:04

2   received an extension or access to a private API,

3   right?

4   A.   Facebook gave developers a year to

5   transition from API version 1 to version 2.   09:18:20

6   Q.   Okay. And not all apps received

7   extensions beyond that time period, right?

8   A.   Not all apps were -- were given

9   additional time to migrate.

10   Q.   And so for those apps that relied on   09:18:36

11 friend information for the user experience that did

12 not receive an extension beyond a year, the -- the

13 user experience was broken for those apps, right?

14   MR. SCHWING: Object to form.

15   THE DEPONENT: I don't think that's an   09:18:59

16 appropriate characterization to make. Many

17 developers updated their application, such that it

18 continued to -- to operate.

19   Q.   (By Mr. Loeser) But for those that

20 depended on the same nonapp friend information that   09:19:15

21 they got before the transition to the new platform,

22 the user experience was broken for those apps,

23 right?

24   MR. SCHWING: Object to form.

25   THE DEPONENT: No, I don't think that's   09:19:31

                                            Page 1202

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1	an appropriate characterization to make. Apps --	09:19:33
2	developers were in many cases up -- able to update	
3	their application such that it did not rely on	
4	access to that information.	
5	Q. (By Mr. Loeser) So there were no apps	09:19:49
6	for which the user experience was broken as a	
7	result of not providing the app with private API	
8	for that information?	
9	MR. SCHWING: Object to form.	
10	THE DEPONENT: That's also not quite what	09:20:04
11	I said. I said that many -- many developers were	
12	able to update their application. Others choose	
13	to -- chose to stop offering their application.	
14	And there would have been some developers who did	
15	none of those things. And their application would	09:20:19
16	behave in different ways depending on exactly how	
17	their application was built.	
18	Q. (By Mr. Loeser) So how did Facebook	
19	decide which user experiences to break and which	
20	user experiences not to break when it came to	09:20:31
21	providing friend sharing extensions?	
22	MR. SCHWING: Object to form.	
23	THE DEPONENT: Facebook evaluated -- the	
24	partnerships team at Facebook along with the -- the	
25	work team, evaluated whether or not it was	09:20:51

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1   appropriate to grant an extension typically based   09:20:59

2   on whether or not the developer had the -- the

3   ability -- had been able to update their

4   integration in time, and whether or not more time

5   would prevent a broken user experience.   09:21:17

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10   Q.   (By Mr. Loeser) Mr. Cross, does   09:23:30

11   Jackie Chang still work for Facebook?

12   A.   I'm -- I think she may still work for

13   Facebook but is on maternity leave.

14   Q.   And to prepare for your testimony

15   regarding friend sharing and whitelisting, did you   09:23:46

16   speak with Jackie Chang?

17   A.   I did not speak with Jackie Chang. As I

18   understand she's -- she's currently on leave.

19   Q.   Is that the reason why you didn't try to

20   speak with her?   09:24:02

21   A.   Typically if someone is on leave, I would

22   generally like to leave them on leave.

23   Q.   And do you know when she returns from

24   leave?

25   A.   I -- I'm not sure when she returns from   09:24:19

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 1   leave, I'm afraid.                                09:24:22

 2           MR. LOESER:  Why don't we go off the

 3   record.

 4           THE VIDEOGRAPHER:  Okay.  We're off the

 5   record.  It's 9:24 p.m.                            09:24:38

 6           (Recess taken.)

 7           THE VIDEOGRAPHER:  We're back on the

 8   record.  It's 9:34 p.m.

 9                   EXAMINATION

10   BY MR. SCHWING:                                    09:34:07

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 5        Q.   Were third parties whitelisted for friend      09:35:43

 6    information because of the revenue that they

 7    deliver to Facebook?

 8        A.   No.

 9        Q.   Are third parties whitelisted for friend

10    information because of their advertising spend?      09:35:58

11        A.   No.

12             MR. SCHWING:  I don't have anything

13    further.

14             MR. LOESER:  Brief follow up.

15                  FURTHER EXAMINATION      09:36:10

16    BY MR. LOESER:

17        Q.   You referred to an effort to migrate, was

18    it site bar -- what was migrated from what to what?

19        A.   So the gatekeeper tool contained a number

20    of gatekeepers, which we used to modify the      09:36:32

21    behavior of the API based on an app ID, and --

22    where Facebook uncovered or identified -- sorry,

23    where Facebook identified gatekeepers that were

24    based on an app ID then that gatekeeper was

25    migrated to be a capability.      09:36:58
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1   Q.   And what prompted that migration?   09:37:00

2   A.   A desire to have a single tool to manage

3   all of the ways in which the API behavior could be

4   modified.

5   Q.   Now, Mr. Cross, in response to   09:37:37

6   Mr. Schwing's question about revenue, you've

7   testified that partners were not whitelisted for

8   friend data because the revenue they deliver to

9   Facebook.

10   Is that your testimony as Facebook's   09:37:56

11   corporate designee?

12   A.   My understanding from reviewing documents

13   and speaking to people, is the revenue or ad spend

14   was not a determining factor as to whether or not

15   an app was granted access to friends data.   09:38:15

16   Q.   And the basis of your knowledge there,

17   that's not based on your personal knowledge is it?

18   A.   I certainly have no personal knowledge

19   of -- sorry. Let me put that another way.

20   In my experiences, I'm -- I was not aware   09:38:36

21   of anytime revenue was used to make a whitelisting

22   decision with regards to friends data, and the

23   people I spoke to in -- in preparation for this

24   testimony also concurred with that view.

25   Q.   And those people you spoke to are two   09:39:04

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1	individuals that you identified before Mr. Mehta	09:39:06
2	and Mr. Archibong; is that right?	
3	MR. SCHWING: Misstates testimony.	
4	THE DEPONENT: Those are two of the	
5	people that I spoke to in preparation for today.	09:39:17
6	Q. (By Mr. Loeser) And is there anybody	
7	else that told you that ad spend and revenue was	
8	not taken into account by Facebook when deciding	
9	which partners to whitelist?	
10	A. I can't recall the names of all the other	09:39:35
11	people I spoke to in -- in preparation for this,	
12	but all the people I spoke to, and of all the	
13	documents I reviewed, concurs with the -- the	
14	understanding that revenue was not taken into	
15	account with regards to whitelisting apps to friend	09:39:58
16	information.	
17	Q. Now, Mr. Cross, we went through many,	
18	many documents that suggest to the contrary, didn't	
19	we?	
20	MR. SCHWING: Argumentative. Lacks	09:40:11
21	foundation.	
22	Q. (By Mr. Loeser) Isn't that true,	
23	Mr. Cross?	
24	A. We've been through documents which --	
25	looked to assess the potential impact of the	09:40:25

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1	changes. And -- and some of those documents	09:40:27
2	mentioned revenue as -- as part of the early	
3	assessments.	
4	But when speaking to the people that were	
5	involved in native whitelisting, the revenue from	09:40:44
6	these device integration partners were, or other	
7	platform partners, was not considered as part of	
8	the decision to -- to grant them access.	
9	Q. And so you're saying that because these	
10	two individuals you talked to told you that?	09:41:07
11	MR. SCHWING: Object --	
12	Q. (By Mr. Loeser) The documents certainly	
13	don't tell you that, do they?	
14	MR. SCHWING: Argumentative. Lacks	
15	foundation.	09:41:17
16	THE DEPONENT: Speaking to people who	
17	were involved in -- in the decisions as to why apps	
18	ultimately were granted extensions or exemptions	
19	they -- the impact on -- on revenue from not doing	
20	so, was not an impact. Was not a factor in the	09:41:40
21	decision-making.	
22	Q. (By Mr. Loeser) Well, did you -- did you	
23	identify any internal documents at Facebook that	
24	said what you just said?	
25	MR. SCHWING: Object to form.	09:41:56

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1   Q.   (By Mr. Loeser) Any? Did you identify a   09:42:01

2   single document that confirms what you just said?

3   MR. SCHWING: Same objection.

4   THE DEPONENT: I reviewed a number of

5   documents. I -- I don't recall a document that --   09:42:15

6   that says exactly what I just said. Again,

7   speaking to the -- the people involved and from my

8   own experiences, involved in -- in this time in

9   terms of giving apps -- giving partners continued

10   access to -- to friend data for a period of time as   09:42:41

11   an extension or exemption, the revenue from those

12   partners was -- was not a factor in the

13   decision-making as to whether or not to grant them

14   full access.

15   Q.   (By Mr. Loeser) Mr. Cross, can you   09:42:55

16   identify even one document generated internally at

17   Facebook that says that ad revenue, ad spend and

18   revenue was not taken into account when deciding

19   which partners to whitelist?

20   MR. SCHWING: Object to form. Asked and   09:43:15

21   answered.

22   THE DEPONENT: I can't identify as I sit

23   here a -- a document that --

24   SPECIAL MASTER GARRIE: Answer the

25   question. Yes or no. It is a simple question,   09:43:26

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1	answer it accordingly.	09:43:33
2	THE DEPONENT: As I sit here today, I	
3	can't identify a document that -- that says that	
4	specifically.	
5	Q. (By Mr. Loeser) Now, Mr. Cross, you say	09:43:46
6	you talked to two individuals who told you that	
7	revenue and ad spend was not taken into account in	
8	whitelisting decisions.	
9	Has it occurred to you that perhaps	
10	they're not telling you the truth?	09:43:56
11	MR. SCHWING: Object to form.	
12	THE DEPONENT: I suppose -- the people I	
13	spoke in preparation for this deposition are people	
14	that were involved over -- over a long period of	
15	time in how Facebook manages its developer platform	09:44:21
16	and platform partnerships.	
17	These people are knowledgeable about	
18	their -- about their space and they were effusive	
19	in helping me understand their view on how	
20	whitelisting decisions were made.	09:44:43
21	And revenue was not considered in the	
22	ultimate decision to whitelist. The documents	
23	you're, I think referring to, for example,	
24	Ms. Mosseri is -- is a draft document. It was	
25	prepared when the company was attempting to	09:45:07

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 1   understand the potential impact.  And, you know, my      09:45:13

 2   understanding is that as a result, of my

 3   conversations, revenue was not a factor in deciding

 4   whether or not to grant apps continued access to

 5   friend data.                                             09:45:35

 6        Q.   (By Mr. Loeser)  Mr. Cross, I asked you a

 7   very simple and straightforward question.  Would

 8   you like me to read it back to you so that you can

 9   answer it?  I'll ask it again.

10           Mr. Cross, you say, you talked to two          09:45:47

11   individuals who told you that revenue and ad spend

12   was not taken into account in whitelisting

13   decisions.

14           Has it occurred to you that perhaps they

15   are not telling you the truth?                           09:45:58

16           MR. SCHWING:  The question is

17   argumentative.

18           THE DEPONENT:  I have no reason --

19           SPECIAL MASTER GARRIE:  Answer the

20   question.                                                09:46:09

21           THE DEPONENT:  I have no reason to doubt

22   they were telling me the truth.

23        Q.   (By Mr. Loeser)  And, Mr. Cross, when you

24   spoke to those two individuals, did you bring to

25   their attention the series of documents that we         09:46:19
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 1    sent over to you before your deposition that talked      09:46:22

 2    about the identification of strategic partners and

 3    the revenue received from them in whitelisting

 4    decisions?

 5        A.   And so I think the last of what you said      09:46:40

 6    there is -- is not -- I'm not sure I fully

 7    understand.  We -- the -- I'm sorry.  I -- that was

 8    about three things in that -- in that question

 9    which -- which I would like to unpick.

10            Can you ask me the question again,            09:46:58

11    please.

12        Q.   Mr. Cross, were you provided with any

13    contemporaneous -- contemporaneous written record

14    from the people you spoke to about the basis for

15    whitelisting decisions that indicated that revenue      09:47:26

16    and ad spend was not taken into account in making

17    those decisions?

18        A.   Was I provided with any

19    contemporaneous -- like -- sorry.  I'm -- I'm

20    really -- I'm really just not sure I'm              09:47:45

21    understanding that question.

22        Q.   Okay.  By "contemporaneous," I mean at

23    the time the whitelisting decisions were made, were

24    you provided with any written record from the time

25    at which whitelisting decisions were made that      09:47:59
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1	indicated that ad revenue -- that ad spend and	09:48:01

1   indicated that ad revenue -- that ad spend and   09:48:01

2   revenue was not taken into account in the

3   whitelisting decisions?

4   MR. SCHWING: Object to form.

5   THE DEPONENT: I was not provided with --   09:48:16

6   with -- with documents that -- that state that

7   ad revenue was not included in the decision-making.

8   Although my -- again, my conversations

9   and the documents I've reviewed talk about what

10   factors were included, it would not necessarily be   09:48:37

11   normal for them to be explicit, that was not

12   included.

13   Q.   (By Mr. Loeser) And, Mr. Cross, when

14   conducting your own investigation to determine if

15   you had been told the truth, did you go find out   09:48:53

16   how much money the whitelisted partners had paid to

17   Facebook after 2014?

18   MR. SCHWING: Object to form.

19   THE DEPONENT: I, in preparation for this

20   case, did not attempt to find out how much revenue   09:49:17

21   these partners -- certain partners had paid

22   Facebook over time. And because from my own

23   observations in speaking to the people involved,

24   the decisions to whitelist were based on the desire

25   to keep valuable integrations running and to   09:49:42

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1	minimize broken experiences for widely used apps,	09:49:51
2	and to give developers, some developers additional	
3	time to migrate.	
4	In -- in none of that -- none of those in	
5	the documents that I reviewed about the time in	09:50:08
6	terms of whitelisting decisions, was -- was revenue	
7	mentioned in relation to friend data.	
8	Q. (By Mr. Loeser) Mr. Cross, I'm going to	
9	ask you one more time. And I would like a	
10	yes-or-no answer to a yes-or-no question.	09:50:24
11	And then we can be finished for the	
12	night.	
13	In conducting your own investigation to	
14	determine if you had been told the truth, did you	
15	go find out how much money the whitelisted partners	09:50:34
16	had paid to Facebook after 2014, yes or no?	
17	MR. SCHWING: Argumentative.	
18	THE DEPONENT: No, I did not conduct an	
19	investigation into how much money those partners	
20	had spent on ad revenue.	09:51:00
21	MR. LOESER: Thank you. Those are the	
22	questions I have.	
23	Just noting for the record, Mr. Schwing,	
24	we do have concerns about the ability of the	
25	witness to testify as to certain topics. I won't	09:51:14

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1	take anymore of his time right now on the record.	09:51:17

```
 1    take anymore of his time right now on the record.     09:51:17

 2    We can talk about that later, but obviously reserve

 3    the right based on our ongoing conversations to --

 4    to have more questions of perhaps another witness.

 5           But I appreciate Mr. Cross's time.  I          09:51:29

 6    know this has been a -- a long deposition, and

 7    thank you very much for your willingness to

 8    participate.  And that's all I have for the night.

 9           MR. SCHWING:  And, Derek, obviously we --

10    we reserve all rights and with respect to the issue    09:51:44

11    you raised and we're happy to discuss that with you

12    off the record at a later time.

13           One housekeeping item is, I would suggest

14    that the witness be given 45 days to review his

15    testimony.  I think that's what we've been doing       09:52:00

16    for the most part in the case --

17           SPECIAL MASTER GARRIE:  30 days.

18           MR. SCHWING:  -- provide any corrections.

19           SPECIAL MASTER GARRIE:  I think Gibson

20    requested 30 days.                                     09:52:11

21           MR. SCHWING:  Well, Special Master

22    Garrie, I think we actually were using 45.  The

23    last time I got on with Mr. Cross I said 30 days

24    because I was the new guy, and didn't realize what

25    we had been doing.                                     09:52:21
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 1              SPECIAL MASTER GARRIE:  Is that in the        09:52:22

 2   protocol?  There was an explicit request in the

 3   protocol.  I can't remember what it is.

 4              MR. SCHWING:  Yeah.

 5              SPECIAL MASTER GARRIE:  But I know you        09:52:28

 6   added specific language for that request, so

 7   whatever it is -- it is.

 8              MR. LOESER:  We can go off the record and

 9   we can --

10              MR. SCHWING:  Yeah, and the other --         09:52:36

11   well, before we go off the record -- we're still on

12   the record, right?

13              SPECIAL MASTER GARRIE:  Still on the

14   record.

15              MR. SCHWING:  The testimony and documents     09:52:46

16   should -- the testimony should be treated as

17   "Highly Confidential" and we'll be obviously

18   reviewing the testimony and making appropriate

19   designations.

20              MR. LOESER:  Understood.                      09:52:58

21              Okay.  Let's go off the record.

22              THE VIDEOGRAPHER:  Okay.  We're off the

23   record.  It's 9:53 p.m.

24              (TIME NOTED:  9:53 p.m.)

25                      ---o0o---                             09:53:06
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1   I, Rebecca L. Romano, a Registered

2   Professional Reporter, Certified Shorthand

3   Reporter, Certified Court Reporter, do hereby

4   certify:

5   That the foregoing proceedings were taken

6   before me remotely at the time and place herein set

7   forth; that any deponents in the foregoing

8   proceedings, prior to testifying, were administered

9   an oath; that a record of the proceedings was made

10   by me using machine shorthand which was thereafter

11   transcribed under my direction; that the foregoing

12   transcript is true record of the testimony given.

13   Further, that if the foregoing pertains to the

14   original transcript of a deposition in a Federal

15   Case, before completion of the proceedings, review

16   of the transcript [X] was [ ] was not requested.

17   I further certify I am neither financially

18   interested in the action nor a relative or employee

19   of any attorney or any party to this action.

20   IN WITNESS WHEREOF, I have this date

21   subscribed my name.

22

23   Dated: June 24, 2022

24   _____

                    Rebecca L. Romano, RPR, CCR

25   CSR. No 12546

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3   E R R A T A   S H E E T

4   PAGE__1003__   LINE__1____   CHAN ███████████_____

5   _____

6   REASON transcription error_____

7   PAGE__1016__   LINE__6____   CHAN ████████████████████_

8   _____

9   REASON transcription error_____

10 PAGE__1022__   LINE__7____   CHANGE ████████████████████_

11 _____

12 REASON misspoke_____

13 PAGE__1024__   LINE__19___   CHANGE ██████████████_____

14 _____

15 REASON transcription error_____

16 PAGE__1028__   LINE__8____   CHANGE █████████_____

17 _____

18 REASON transcription error_____

19 PAGE__1029__   LINE__6____   CHANGE "most of" to "most"_____

20 _____

21 REASON misspoke_____

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4   PAGE___1031___ LINE_7_____ CHAN ████████_____

5   _____

6   REASON transcription error_____

7   PAGE__1032___ LINE 4_____ CHAN ███████_____

8   _____

9   REASON misspoke_____

10   PAGE__1033___ LINE 10____ CHANGE████████████_____

11   _____

12   REASON transcription error_____

13   PAGE__1035___ LINE 1_____ CHANGE████████████_____

14   _____

15   REASON misspoke_____

16   PAGE__1050___ LINE 22____ CHANGE█████████_____

17   _____

18   REASON transcription error_____

19   PAGE__1052___ LINE 6_____ CHANGE██████████_____

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9   REASON transcription error_____

10   PAGE__1054__   LINE__8____   CHANGE███████_____

11   _____

12   REASON transcription error_____

13   PAGE__1057__   LINE__17____   CHANGE█████_____

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15   REASON transcription error_____

16   PAGE__1062__   LINE__24____   CHANGE█████████_____

17   _____

18   REASON transcription error_____

19   PAGE__1065__   LINE__17____   CHANGE███████_____

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6   REASON transcription error _____

7   PAGE___1074___ LINE_3_____ CHAN █████████_____

8   _____

9   REASON transcription error _____

10   PAGE_1077____ LINE_10_____ CHANGE █████████_____

11   _____

12   REASON transcription error _____

13   PAGE_1080____ LINE_14_____ CHANGE ████████████_____

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16   PAGE_1081____ LINE_16_____ CHANGE █████████████_____

17   _____

18   REASON transcription error _____

19   PAGE_1117____ LINE_18_____ CHANGE █████████████_____

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 6    REASON transcription error_____

 7    PAGE__1136___ LINE__19_____ CHAN ██████████_____

 8    _____

 9    REASON transcription error_____

10    PAGE__1136___ LINE__24_____ CHANGE ██████████_____

11    _____

12    REASON transcription error_____

13    PAGE__1149___ LINE__21_____ CHANGE █████████████_____

14    _____

15    REASON transcription error_____

16    PAGE__1175___ LINE__24_____ CHANGE "developing" to "developer"___

17    _____

18    REASON transcription error_____

19    PAGE__1190___ LINE__25_____ CHANGE █████████_____

20    _____

21    REASON transcription error_____

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4   PAGE__1191__ LINE_8_____ CHAN ███████████_____

5   _____

6   REASON_transcription error_____

7   PAGE__1200__ LINE_6_____ CHANGE_"understand" to "understanding"___

8   _____

9   REASON_transcription error_____

10   PAGE__1206__ LINE_22____ CHANGE_███████████_____

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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